

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>	
Bradford J. Sandler, Esq. Paul J. Labov, Esq. Colin R. Robinson, Esq. PACHULSKI STANG ZIEHL & JONES LLP 780 Third Avenue, 34 <sup>th</sup> Floor New York, NY 10017 Telephone: (212) 561-7700 Email: bsandler@pszjlaw.com plabov@pszjlaw.com crobinson@pszjlaw.com	
<i>Counsel to the Plan Administrator</i>	
In re:	Chapter 11
20230930-DK-BUTTERFLY-1, INC. f/k/a Bed Bath & Beyond, Inc., <i>et.al.</i> , <sup>1</sup>	Case No. 23-13359 (VFP)
Debtors.	(Jointly Administered)

**APPLICATION FOR PRO HAC VICE ADMISSION OF**

**ERIN ELIZABETH GRAY, ESQ.**

Pursuant to Rule 101.1(c) of the Local Civil Rules for the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules for the United States Bankruptcy Court for the District of New Jersey, the undersigned hereby seeks entry of an Order granting the admission *pro hac vice* of Erin Elizabeth Gray, Esq. of the law firm of Pachulski Stang Ziehl &

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<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond, Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtor's claims and noticing agent at <https://restructuring.ra.kroll.com/bbby/>.

Jones LLP to represent Michael Goldberg, as plan administrator (the “Plan Administrator”)<sup>2</sup> before this Court in connection with the above-captioned chapter 11 cases.<sup>3</sup>

In support of this Application, the undersigned submits the attached Certification of Erin Elizabeth Gray, Esq. and requests that the proposed form of order submitted herewith be entered. The undersigned certifies that he is admitted, practicing, and a member in good standing The Bar of the State of New Jersey and is admitted to practice before the United States District Court for the District of New Jersey.

Dated: November 12, 2024

/s/ Colin R. Robinson

Colin R. Robinson, Esq.

**PACHULSKI STANG ZIEHL & JONES LLP**

780 Third Avenue, 34th Floor

New York, NY 10017

Telephone: (212) 561-7700

Facsimile: (212) 561-7777

Email: [crobinson@pszjlaw.com](mailto:crobinson@pszjlaw.com)

*Counsel to the Plan Administrator*

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<sup>2</sup> The Plan Administrator has been appointed pursuant to the Debtors’ Plan, as defined herein. The Plan Administrator is responsible for and has the authority to administer certain post-confirmation responsibilities under the Plan on behalf of the Reorganized Debtors.

<sup>3</sup> A proposed Order is attached as **Exhibit A**.

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Debtors.	(Jointly Administered)

**CERTIFICATION OF ERIN ELIZABETH GRAY, ESQ. IN SUPPORT  
OF APPLICATION FOR ORDER FOR ADMISSION *PRO HAC VICE***

I, Erin Elizabeth Gray, Esq., hereby certify and state as follows:

1. I am an attorney with the law firm of Pachulski Stang Ziehl & Jones LLP. I have an office located at 10100 Santa Monica Boulevard, Suite 1300, Los Angeles, California 90067.
2. I am a member in good standing of the bar of the State of South Carolina (admitted in 2018). A copy of my certificate of good standing from the Supreme Court of South Carolina is attached as **Exhibit B**. I am also a member in good standing of the bar of the state of California

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(admitted in 1992). The name and address of the office maintaining the roll of the members of that bar is the State Bar of California (1-888-800-3400, or [cos@calbar.ca.gov](mailto:cos@calbar.ca.gov)).<sup>2</sup>

3. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

4. I submit this Certification in support of the application to permit me to appear and participate *pro hac vice* as counsel to Michael Goldberg, as Plan Administrator in this chapter 11 cases.

5. Upon being admitted to appear and participate in these chapter 11 cases *pro hac vice*, I shall promptly cause payment to be made to the Clerk of the Court in the amount of \$250.00 pursuant to Rule 101.1(c)(3) of the Local Civil Rules of the United States District Court for the District of New Jersey (“D.N.J. L.R.”).

6. I have been advised of my obligation to make payments of an annual fee to the New Jersey Lawyers Fund for Client Protection in accordance with the New Jersey Court Rule 1:28 and shall immediately comply with the requirement upon my admission *pro hac vice*.

7. I will abide by D.N.J. L.R. 101.1(c).

8. I have familiarized myself with the Local Rules of Bankruptcy Procedure promulgated by this Court and will at all times conduct myself in accordance with such Rules during the conduct of these cases.

9. I understand that, upon admission *pro hac vice*, I am within the disciplinary jurisdiction of this Court and agree to notify the Court immediately of any matter affecting my standing at the bars of any other court.

I certify under penalty of perjury that the foregoing is true and correct.

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<sup>2</sup> On November 12, 2024, I ordered a copy of my Certificate of Good Standing from the California Bar Association. I was advised that it should arrive in 10-12 business days.

Dated: November 12, 2024

/s/ Erin Elizabeth Gray

Erin Elizabeth Gray, Esq.

**PACHULSKI STANG ZIEHL & JONES LLP**

10100 Santa Monica Boulevard, Suite 1300

Los Angeles, CA 90067

Telephone: (310) 277-6910

Facsimile: (310) 201-0760

Email: egray@pszjlaw.com

# EXHIBIT A

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
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Bradford J. Sandler, Esq. Paul J. Labov, Esq. Colin R. Robinson, Esq. PACHULSKI STANG ZIEHL & JONES LLP 780 Third Avenue, 34 <sup>th</sup> Floor New York, NY 10017 Telephone: (212) 561-7700 Email: bsandler@pszjlaw.com plabov@pszjlaw.com crobinson@pszjlaw.com	
<i>Counsel to Plan Administrator</i>	
In re:	Chapter 11
20230930-DK-BUTTERFLY-1, INC. f/k/a Bed Bath & Beyond, Inc., <i>et.al.</i> , <sup>6</sup>	Case No. 23-13359 (VFP)
Debtors.	(Jointly Administered)

**ORDER FOR ADMISSION *PRO HAC VICE***

The relief set forth on the following page is **ORDERED**.

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This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Erin Elizabeth Gray be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may sign and file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Unless otherwise permitted by the Court, local counsel must attend all hearings and proceedings before the Court, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$250.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:



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United States District Court  
District of New Jersey  
Martin Luther King, Jr. Federal Building  
50 Walnut Street  
Newark, N.J. 07102  
*Attention: Pro Hac Vice Admissions*

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

# **EXHIBIT B**

# The Supreme Court of South Carolina

## Certificate of Good Standing

I, Patricia A. Howard, Clerk of the Supreme Court of South Carolina, do hereby certify that Erin Lee-Elizabeth Gray (Erin Gray) was duly sworn and admitted as an attorney in this state on May 22, 2018 and is currently a regular member of the South Carolina Bar in good standing.

*Patricia A. Howard*

CLERK

Columbia, South Carolina

November 12, 2024

This certificate of good standing was automatically generated using the South Carolina Attorney Information System. The current status of any person holding a license or certificate to practice law in South Carolina may be obtained using the search function at <https://www.sccourts.org/attorneys/dspSearchAttorneys.cfm>. For questions and concerns, please contact the Office of Bar Admissions at 803-734-1317.